

Site Control Criteria

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SouthwestPowerPool



SPPorg



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Interconnection Customers

In order to address the multiyear backlog in the SPP Generation Interconnection Queue, SPP filed with FERC significant changes to the SPP Tariff Attachment V, on 10/29/2021. These included numerous Site Control Criteria changes. FERC approved those changes, in total, and the newly revised Tariff became effective 15 January 2022.

<https://opsportal.spp.org/documents/studies/SPP%20Tariff%20Attachment%20V%20Generator%20Interconnection%20Procedures.pdf>

Tariff Services Team

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SPP Site Control Requirements

Under SPP Tariff, Attachment V “Generator Interconnection Procedure”, Section 8.2.a, Site Control is required under certain conditions in order for a Generation Interconnection Request to be validated, accepted and/or remain active.

SPP will not be able to Validate or Accept Generation Interconnection Requests without reasonable demonstration of control over real property.

Any questions, please email: GIStudies@SPP.org

Definition of Site Control

Site Control: shall mean documentation reasonably demonstrating: (1) ownership of, a leasehold interest in, or a right to develop a site of sufficient size for the purpose of constructing the Generating Facility; (2) an option to purchase or acquire a leasehold site of sufficient size for such purpose; or (3) an exclusivity or other business relationship between Interconnection Customer and the entity having the right to sell, lease or grant Interconnection Customer the right to possess or occupy a site of sufficient size for such purpose.

What We Are Looking For Part 1

- Documentation must reasonably demonstrate that Site Control exists and/or is in place.
- Site Control should defensibly show: ownership, right to develop, purchase, acquire, possess or occupy through an ‘exchange of real property’.
- SPP is unable to accept Letters of Intent or other Agreements with exclusivity solely for discussions or negotiations.
- Site Control shall have an expiry date commensurate with the project Commercial Operation Date or beyond.
- The evidence of ownership provided for Site Control must be from the same company name that is providing the Interconnection Request or the parties must demonstrate to SPP satisfaction the relationship between the owner with site control and the party requesting interconnection.

What We Are Looking For Part 2

- Demonstration that Site Control provides for exclusivity to the specified Interconnection Request and meets acreage requirements.
- If Site Control is not exclusive to the specified Interconnection Request, Interconnection Customer must account for any other projects that may utilize all or part of the same site or Right of Way (ROW) corridor.
- Site Control shall include, but not limited to, a Geographic Information System (GIS) site plan map, associated data files and documentation that shows sufficient acreage requirements are met and boundaries of the Interconnection Customer's landlease / ownership for the citing of the Generating Facility, Collector Substation, the Interconnection Facilities (if applicable) and Point of Interconnection.

What We Are Looking For Part 3

- If the Site is shared with other projects, the Interconnection Customer shall include demonstration their Interconnection Request is concurrently feasible with other projects that may share all or part of the same Site Control, including identification of those shared Interconnection Requests or existing Generating Facilities and any related technical information depicting how the proposed location and space will be utilized for all projects sharing the Site Control.

What Is Needed

- Reasonable Documentation that provides material control over real property.
 - Land Lease Agreements , Leasehold Agreements or Purchase Options, citing the actual acreage represented
 - Evidence of duly notarized, filed or formally authorized
 - Contractual terms commensurate with Commercial Operation Date of the Interconnection Project
- Completed and Signed Attestation Form
<http://opsportal.spp.org/documents/studies/AttestationStatementForSiteControl.pdf>
- Meet minimum acreage requirements, per SPP Site Control criteria or propose alternative site size based on final layout drawings under Section 8.2.a of the GIP and/or manufacturer's specs.

Recommended Acreage

- Because of the unique geography of our region, SPP seeks the minimum specifications for acceptable site control sizing for new generation interconnection requests:
 - Wind Generation – 30 acres per MW
 - Solar Generation – 6 acres per MW
 - Storage/Battery – 1 acre per MW or manufacturer specifications
 - Conventional Generation – 40 acres (fixed) or manufacturer specifications

Interconnection Customer may propose an alternative site size, refer to Section 8.2.a of Attachment V for list of additional requirements.

Deviations of Site Control as originally submitted in the DISIS Cluster are subject to review and approval by SPP.

References

- Typical discussions of Site Control may be found in SPP Tariff Attachment V, in the following sections:
 - Section 1 – Definitions
 - Section 8.2.a – Demonstration of Site Control
 - Section 11.3 – Execution and Filing
 - Attachment A to Appendix 3, line 7 – Interconnection Request
 - Other Sections not cited here
- SPP’s Site Control criteria is predicated on FERC Docket No. ER09-1254-002, para 31, which reads in part: “{FERC} also declines to require SPP to adopt features of the site control standards establish by other RTOs/ISOs.” It further states: “The Commission has found that the independent entity variation standard provides the RTO and ISO with greater flexibility to customize its interconnection procedures and agreements to fit regional needs.”

Additional Site Control Requirements per Revised Tariff Effective 1/15/2022

The following additional Site Control Requirements affect DISIS-2018-001 Cluster Study through current. DISIS-2017-002 Cluster Study and prior are not required to meet these new changes.

- General Site Control requirements remain in effect, for the Generating Facility, as per Section 8.2(a)1 per Attachment V, including revised Attestation Form
- Generating Facility Tie Line Site Control requirements have been added, per Section 8.2.(a)2 of Attachment V and typically commences from the collector system station(s) to the Point of Interconnection
- “In Lieu Of” Financial Securities for Site Control will be included at risk of forfeiture per Section 8.14(b-c) of Attachment V

Site Control For Generating Facility Tie Line

The provisions for Site Control, under SPP Tariff, Attachment V, Section 8.2(a)2, offer two primary options to satisfy the requirement:

- “In Lieu Of” Financial Security for the Gen Tie Line. This is fulfilled by providing \$80,000 per mile of Gen Tie length, based on the entire length. Example: If the Gen Tie length is 6 miles, the “In Lieu Of” Financial Security would be $\$80,000 \times 6 = \$480,000$ *(The tariff does not make allowances to ‘round’ values in this calculation)*
- Or, typical Site Control documentation, satisfied by fully executed land / lead agreements with expiry dates no sooner than the Commercial Operation of the Interconnection Request. Includes current Attestation Form.

Site Control For Generating Facility Tie Line

Per SPP Tariff, Attachment V, Section 8.2(a)2, the following additional Site Control requirements now include:

- Upon submission or transition to the newly revised Tariff, reasonable evidence of Site Control for at least fifty percent (50%) of the mileage of the Generating Facility's high voltage tie line to the Point of Interconnection, or in lieu of Site Control for the Generating Facility's high voltage tie line, additional financial security in the amount of \$80,000 per entire line mileage right-of-way. Mileage will not be rounded for calculation purposes.

Site Control For Generating Facility Tie Line (continued)

Further . . . Per Section 8.5.2, before the end of Decision Point 2, part (5):

- (5) Reasonable evidence of Site Control for at least seventy-five percent (75%) of the mileage of the Generating Facility's high voltage tie line to the Point of Interconnection, or in lieu of Site Control for the Generating Facility's high voltage tie line, additional financial security in the amount of \$80,000 per entire line mileage right-of-way. Mileage will not be rounded for calculation purposes.

Site Control For Generating Facility Tie Line (continued)

Further . . . Per Section 8.5.2, before the end of Decision Point 2, part (6) and (7):

- (6) reasonable evidence of Site Control of one-hundred percent (100%) of any new substations identified as required at the Point of Interconnection;
- (7) reasonable evidence of having satisfied at least one development milestone described in Section 11.3 of the GIP

Site Control For Generating Facility Tie Line (continued)

Further . . . Per Section 8.5.2, before the end of Decision Point 2, part (6) and (7):

- (6) reasonable evidence of Site Control of one-hundred percent (100%) of any new substations identified as required at the Point of Interconnection;
- (7) reasonable evidence of having satisfied at least one development milestone described in Section 11.3 of the GIP

Site Control For Generating Facility Tie Line (continued)

In several instances, withdrawing your Generation Interconnection Request may result in forfeiture of the Financial Securities provided “In Lieu Of” Site Control.

- Familiarize yourself with the Financial Security Refund Eligibility details under SPP Tariff Attachment V, Section 8.14

<https://opsportal.spp.org/documents/studies/SP%20Tariff%20Attachment%20V%20Generator%20Interconnection%20Procedures.pdf>